

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

DAVID WILLIAM WOOD,

Plaintiff,

v.

Civil No. 3:15-cv-00594-MHL

CREDIT ONE BANK, N.A.,

Defendant.

DEFENDANT CREDIT ONE BANK'S EXHIBIT LIST

Defendant Credit One Bank (“Credit One”), by counsel and pursuant to the Court’s Order dated October 12, 2017 (ECF No. 101), and the parties’ consent motion dated December 8, 2017, provides the following revised list of proposed exhibits. This list may change subject to (1) the Court’s rulings on the parties’ motions *in limine*; and (2) Plaintiff’s proof at trial. For those reasons, Credit One does not necessarily intend to offer all of these exhibits, nor does it contend that all of them will necessarily be relevant. Subject to those caveats, this list represents Credit One’s best efforts to estimate (as of the date of this filing) all of the exhibits on which it might rely at trial (with the exception, per the Court’s Initial Pretrial Order (ECF No. 29), of exhibits that will be used solely for purposes of impeachment).

EXHIBIT NO.	DOCUMENT	BATES NUMBER/IDENTIFIER
1	Letter from Plaintiff to Credit One 11-4-14	COB00042
2	Letter from Credit One to Plaintiff 11-28-14	COB00043
3	Letter from Plaintiff to Credit One 12-9-14	COB00044
4	Letter from Credit One to Plaintiff 1-12-15	COB00045
5	ACDV Response 4-28-15	COB00048-COB00050

6	ACDV Response 4-28-15	COB00051-COB00052
7	ACDV Response 5-5-15	COB00053-COB00054
8	ACDV Response 6-10-15	COB00055-COB00056
9	ACDV Response 6-15-15	COB00057-COB00058
10	Phone records regarding communications with Plaintiff	COB00059-COB00065
11	ACDV Research by A. Chu	COB04163-COB04165
12	2011 Consumer Credit Reporting Resource Guide	COB0060-COB00316
13	2017 Consumer Credit Reporting Resource Guide Compliance Condition Code Clarification	COB04168-COB04172
14	Credit One Bank Compliance Program and Policy Manual, FCRA Policy	COB00317-COB00359
15	Credit One Bank Customer Service Procedure Manual – Back Office – E-Oscar ACDVs & AUD (version 1.2 dated 3/17/15)	COB00361-COB00419
16	Credit One Bank Customer Service Procedural Manual – Telephones	COB00791-COB01119
17	Credit One Bank Customer Service Procedural Manual – Back Office – Fraud	COB01952-COB02139
18	Copy of Fraud Affidavit to David Wood	COB04173-COB04175
19	West Point Police Department Incident Report	COB04157-COB04158
20	Affidavit of Sergeant Woodson ¹	ECF No. 68-5
21	Affidavit of K. Schumacher	ECF No. 68-13
22	Experian Authentication Affidavit dated 6-3-16	N/A
23	Fraud alert notification from Experian dated 6-25-14	EXPWOOD_SUBP_0000107-EXPWOOD_SUBP_0000128
24	Fraud alert notification from Trans Union dated 4-29-15	Wood v. Equifax, et al Exhibit #000036-#000051

¹ Credit One anticipates that Sergeant Woodson and Ms. Schumacher will testify in person, and therefore their affidavits will not be necessary. However, out of an abundance of caution, Credit One has designated these exhibits in the event it becomes apparent that either witness is unavailable.

25	Credit report of David Wood dated 10-27-14	EXPWOOD_0000067- EXPWOOD_0000086
26	Sample Fraud Affidavit and Cover Letter	COB004160-COB004162

Dated: December 8, 2017

Respectfully submitted,

CREDIT ONE BANK

/s/

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